

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankruptcy No. 19-24789
)	
KEVIN DAVID TOLEJKO,)	
)	
Debtors,)	Chapter 13
)	
_____)	
)	
)	
KEVIN DAVID TOLEJKO,)	
)	
Movants,)	
)	
v.)	
)	
RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE,)	
)	
Respondent.)	

**DECLARATION CERTIFYING THE DEBTORS EXISTING CHAPTER 13 PLAN IS
SUFFICIENT TO PAY THE NEW MORTGAGE AMOUNT**

Movants, by their attorney, Joseph P. Nigro, Esquire, and Nigro and Associates, LLC,
hereby files this Declaration and avers the following:

1. NewRez LLC dba Shellpoint Mortgage Servicing filed a Notice of Mortgage Payment
Change for a mortgage amount change to \$1,933.09.

2. Debtors Chapter 13 Plan pays NewRez LLC dba Shellpoint Mortgage Servicing \$2,092.46 for the mortgage payment.

3. Therefore, since the new mortgage amount is \$1,933.09 and this amount is less than the amount currently under the Plan in the amount of \$2,092.46, no amendment is required to the Chapter 13 Plan.

Respectfully submitted,

12/13/2022
Date

/s/ Joseph P. Nigro
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